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January 8, 2020

Honorable Freda L. Wolfson, Chief Judge
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

**Re: *In Re: Johnson & Johnson Talcum Powder Products Marketing,
Sales Practices and Products Liability Litigation (MDL No. 2738)***

Dear Chief Judge Wolfson:

Having reviewed Defendants' letter to the Court dated January 7, 2020, addressing the recent JAMA publication entitled, "Association of Powder Use in the Genital Area With Risk of Ovarian Cancer," by O'Brien, et al., the Plaintiffs' Steering Committee is compelled to advise the Court of relevant omissions in both the letter and the attachments.

To provide context, the O'Brien study is an update of the cohort studies that have been previously published on the relationship between ovarian cancer and the use of talcum powder and testified to by experts for both the PSC and Defendants. Plaintiffs initially submitted to the Court the Abstract previewing the upcoming article and in doing so, accurately described the study results as demonstrating a statistically significant 9% increase in ovarian cancer with ever powder use, compared to never use. (Doc. 11620, Letter from M. Parfitt and L. O'Dell at 2, Dec. 24, 2019.)

On January 7, 2020, the full article was published in JAMA. That same day, Defendants wrote this Court and represented that they were presenting the "full" article and its contents for the Court's consideration. Defendants further represented to the Court that the published article fails to conclude that there is a

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statistically significant association between the use of powder in the genital area and ovarian cancer.

Defendants omit and fail to reference or attach the Data Tables (Tables 1-4) which are appended to the scientific article. This is a material omission. Contrary to the Defendants' representations of the study results, the data therein support the opinions expressed by the Plaintiffs' experts in their sworn testimony before this Court and which include but are not limited to an increase risk of developing ovarian cancer from genital use of talcum powder products. Plaintiffs attach hereto the Article, **Tables** and Editorial (Exhibits A-C) in support of their experts' general causation opinions. Importantly, data contained within Table 3 supports the Authors' conclusion that women with patent reproductive tracts who used powder one or more times per week (classified as frequent use) experienced a statistically significant 19% increase in ovarian cancer. Data from Table 4 demonstrated a statistically significant increased risk of 21% for frequent users with medically confirmed cases of epithelial ovarian cancer. Additional relevant data regarding the association between genital talc use and ovarian cancer which supports Plaintiffs' experts' opinions is reported in the attached Tables (Tables 1-4), tables that the Defendants chose not to provide this Court.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ Michelle A. Parfitt
Michelle A. Parfitt

/s/ P. Leigh O'Dell
P. Leigh O'Dell

cc: All counsel of record via ECF notification